

ATTACHMENT A:

Affidavit in Support of Criminal Complaint and Arrest Warrant for
Johnathan Trent Thomas

I, Joshua Grout, a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being duly sworn, state as follows:

INTRODUCTION

1. I am presently a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) and serve as a sworn federal law enforcement officer. In that capacity, I am empowered to conduct investigations and to make arrests for offenses enumerated in Titles 8, 18, 19, 21, and 31 of the United States Code and other related offenses. During my tenure as a Special Agent, I have completed approximately 1080 hours of instruction at the Federal Law Enforcement Training Center in Glynco, Georgia (FLETC). Prior to my tenure as a Special Agent, I was a Police Officer with the Charlotte Mecklenburg Police Department (CMPD). During my time at CMPD I worked as a patrol officer and member of the Gang Unit investigating North Carolina state and federal violations of the law. I completed approximately 1220 hours of basic and advanced law enforcement training covering various topics. I have drafted and or executed over 50 state and federal search warrants to include numerous warrants for residences, cellular phones, and social media accounts. I have been the affiant on three title III affidavits and the case agent of a racketeering influencing corrupt organizations (RICO) and violent crime in aid of racketeering (VICAR) case. I have made over 500 arrests for various violations of state and federal crimes. I am a certified digital forensics examiner for cell phones and windows computers through the Defense Cyber Investigative Training Academy. Prior to my time as a Police Officer, I was a Counterintelligence Special Agent

in the United States Army. During my time as a Counterintelligence Agent, I was tasked with investigating violations of the Uniformed Code of Military Justice and Title 18 United States Code involving national security crimes. I attended over 1200 hours of basic and advanced training covering various topics related to conducting national security/ terrorism and cyber investigations. I am currently assigned to the HSI Violent Gang Task Force, with primary investigative responsibilities to investigate, disrupt, and dismantle transnational gangs, transnational criminal organizations, and violent crime within and throughout the Western District of North Carolina.

2. This Affidavit is presented in support of a Criminal Complaint charging **Johnathan Trent Thomas (THOMAS)** with violations of Title 18, United States Code, Sections 875(c) (Interstate communications/threats) and 115(a)(1)(B) (Influencing, impeding, or retaliating against a Federal official).

3. This Affidavit contains information necessary to support probable cause for the Criminal Complaint. The information contained in this Affidavit is based on my personal participation in the investigation of the case and from information provided to me by other Special Agents and Task Force Officers, as well as other federal, state, and local law enforcement officers. Since this Affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts which I believe are necessary to establish the requisite foundation for probable cause.

FACTS IN SUPPORT OF PROBABLE CAUSE

4. The Homeland Security Investigations Homeland Security Task Force is conducting a criminal investigation of THOMAS regarding violations of Title 18, United States Code, Sections 875(c) (Interstate communications/threats) and 115(a)(1)(B) (Influencing, impeding, or retaliating against a Federal official).

5. On May 14, 2025, at approximately 1200 hours, the CMPD Hickory Grove Division Office received a phone call from telephone number 980-875-8014. The caller threatened to kill Immigration and Customs Enforcement (ICE) agents/officers as well as CMPD officers if immigration enforcement action did not stop. This call was not recorded.

6. At approximately 1227 hours, CMPD Sergeant Montero called 980-875-8014, which was the phone number that made the threat to the Hickory Grove Division, to determine the caller's motive and intent. The caller, who later in the conversation identified himself as Johnathan THOMAS, told Sergeant Montero that he was on VA disability and for the rest of the month he would be coming to Charlotte with level 5 plates (body armor), 7.62mm green tip ammunition (armor piercing ammunition) and approximately six-thousand dollars' worth of "nods" (night vision devices) to kill law enforcement officers if he observed anyone making arrests on Albemarle Road as they did day prior. He said he would "shoot them all." The arrests THOMAS was referencing were made by ICE federal agents on Albemarle Road in Charlotte, North Carolina.

7. THOMAS further stated the only thing he would be exercising is "trigger discipline" and "grouping control." THOMAS explained that if a police officer points a gun at him, he won't have a conversation with them, he is just going to open fire. THOMAS said there are five people, including himself, out patrolling the area of Albemarle Road. THOMAS stated he is driving a white Dodge Dakota. Indeed, law enforcement records checks show a white Dodge

Dakota, license tag RJT-6983, registered in THOMAS' name in North Carolina. Sergeant Montero asked THOMAS why he wanted to do this and THOMAS stated it seems like it might be Immigration Customs Enforcement "snatching" people up in unmarked vehicles without wearing uniforms and states that ICE appears like gang members snatching people up. THOMAS stated he is making an "active ability" to patrol and look for ICE. THOMAS stated "God forbid they are doing what they did yesterday, I will swiss cheese their shit." THOMAS stated that is exactly what he did to the Taliban during two deployments.

8. Sergeant Montero continued to ask for the motive behind the call and THOMAS said his grandfather came to the United States on a boat and that he signed up to kill and die for less. THOMAS stated he is going to "kill over this at some point." During the recorded call with Sergeant Moreno, THOMAS hears what he believes to be a recording device and says he is glad that the call was recorded and that if the police show up to his house he has "flower pots" full of Tannerite (an explosive) all around. THOMAS continued to talk about the recording and stated, "if you feel like getting a warrant for anything I've said today, I hope it's worth somebody's life." Sergeant Montero asks who he is talking to and THOMAS states "As you remember, those Marshals got Swiss cheesed and those two other officers, I promise you I could do a whole lot better than that." On April 29, 2024, four law enforcement officers were killed in the line of duty in the Western District of North Carolina.

9. THOMAS told Sergeant Montero his name was Johnathan THOMAS and invited law enforcement to look up his military background and further said, "I'm going to be out and about and I'm going to kill these bastards if I see them doing what they're doing."

10. Law enforcement conducted record checks on the phone number 980-875-8014 and multiple databases showed the number as being associated with Johnathan THOMAS. Subscriber

information provided shows the phone registered to Paul Thomas at 178 Charity Lane, Linwood, North Carolina. Paul Thomas is the owner of the property and possible father of Johnathan THOMAS. A check of law enforcement databases and a review of prior interactions with law enforcement indicate that THOMAS resides at 178 Charity Lane, Linwood, North Carolina. Law enforcement obtained historical electronic location data from AT&T and it showed the cell phone that made the initial call, and was the phone called by the CMPD sergeant, was in the vicinity of 178 Charity Lane, Linwood, North Carolina during the time of the calls. That same 980-875-8014 phone number was also provided to the Davidson County Sheriff's Office by THOMAS during an arrest in 2024.

11. THOMAS has an extensive history with threatening law enforcement to include the Davidson County Sheriff's Office and CMPD. THOMAS previously sent obscene photos to the Sheriff of Davidson County due to THOMAS being upset with the Sheriff's political ads. THOMAS has pending state charges related to that incident. During previous contacts with law enforcement in both Charlotte and Davidson County, firearms were observed in THOMAS' possession, including a rifle and handguns. In the recent past, THOMAS has followed CMPD officers in marked patrol cars while they were attempting to fulfill their official duties. On June 9, 2019, a CMPD officer observed a white Mercury Grand Marquis following him and a traffic stop was made on the vehicle. THOMAS was identified as the driver and officers observed a rifle in the backseat of the vehicle. No charges were filed from this incident and THOMAS made no direct threats during this encounter.

12. Based on the above information, your Affiant respectfully requests the issuance of a criminal complaint against **Johnathan Trent THOMAS**.

CONCLUSION

13. Based upon my training and experience and the facts of this investigation, I submit that there is probable cause for a criminal complaint against, and arrest warrant for **Johnathan Trent THOMAS** for the charge of in violation of Title 18, United States Code, Sections 875(c) and 115(a)(1)(B). I request that the Court issue a Criminal Complaint and Arrest Warrant for the same.

Respectfully submitted,

/s/ Joshua Grout

Joshua Grout, Special Agent
Immigration Customs Enforcement
Homeland Security Investigations

This Affidavit was reviewed by AUSA David Kelly.

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 15th day of May, 2025, at 5:20 PM



W. Carleton Metcalf
United States Magistrate Judge

